

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Jeff Foster,)
)
 Plaintiff/Counter-Defendant,)
) Case No. 2012 cv 3130
 v.)
) Honorable Mary M. Rowland
 PNC Bank, National Association,)
)
 Defendant/Counter-Plaintiff.)

MOTION TO APPOINT SELLING OFFICER

NOW COMES the Counter-Plaintiff, PNC Bank, National Association, by and through its attorneys and moves the Court for the entry of an order appointing Intercounty Judicial Sales Corporation as Selling Officer pursuant to 735 ILCS 5/15-1506(f)(3) and 28 U.S.C. Section 2001 (a). .

If the Counter-Plaintiff chooses to utilize a marketing platform for the subject property, the Counter-Plaintiff is authorized to engage an independent contractor to implement a national marketing platform to reach a larger market for potential third party bidders. The marketing platform shall include providing sale information on a national website, direct-mail advertising, print media marketing, radio marketing, and localized advertising in specific communities. All costs for the additional services provided by the independent marketing contractor shall be borne by the Counter-Plaintiff or the independent marketing contractor. None of the additional costs shall be borne by the Counter-Defendant(s). The independent marketing contractor waives any potential lien rights it may have in the real estate regarding non-payment of the additional costs borne by the Counter- Plaintiff.

Dated: May 19, 2020

PNC Bank, National Association

By:/s/ James M. Crowley

One of its Attorneys

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